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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91226815
Party	Defendant Advanced Polymer Inc.
Correspondence Address	ANDRY HONG ADVANCED POLYMER INC 4208 185TH PL SE ISSAQUAH, WA 98027-9762 UNITED STATES AHONG@ADVANCEDPOLYMER.US
Submission	Motion to Amend/Amended Answer or Counterclaim
Filer's Name	ANDRY HONG
Filer's e-mail	AHONG@ADVANCEDPOLYMER.US
Signature	/ANDRY HONG/
Date	06/24/2016
Attachments	AMMENDED RESPONSE TO DEFAULT JUDGEMENT JUNE 24 2016.PDF(551260 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Serial No. 86/704,515
For the Mark: Caresse
Filed on July 24th 2015,
Published on the *Official Gazette* on February 9th, 2016

CONOPCO, INC.,

Opposer,

-against-

ADVANCED POLYMER, INC.,

Applicant

Opposition No: 91226815

AMENDED RESPONSE TO DEFAULT JUDGEMENT

Advanced Polymer, Inc. ("Applicant"), is a small company with few employees who have many responsibilities and are involved in multiple projects. When this Opposition was filed on March 10th 2016, the Applicant was overwhelmed by customers' demands (peak season: March-July) as well as preparing for the relocation of the entire company to a new location. Moving date is scheduled to be on June 31st, 2016.

The good cause factors that affected the timely filing of an answer to the Opposition were due to:

1. Applicant did not have an attorney.
2. The deadline was miscommunicated to Thai Nguyen, Vice President, who had volunteered to address the Opposition. She was also overwhelmed by responsibilities and projects related to:

-Planning the details and logistics related to moving the company.

-Daily involvement in continuous manufacturing of products to meet customers' demands for two seasons before shutting down production.

-Decommissioning and packing of laboratory and production equipment.

-Finishing the scaling up a new line of nail products.

-Selecting and qualifying new vendors and suppliers before July 2016.


3. More time was needed to collect evidence and information to counter allegations made by the Opposer.

4. Applicant has corrected the missed action by submitting a request for the extension of the deadline and subsequently submitted an answer to the Opposition on June 2nd, 2016.

Applicant hereby requests the Board to not enter the default judgement against the case.

Respectfully submitted

Date: June 24th, 2016

By: 
Andry Hong
Advanced Polymer, Inc.
8661 South 208th Street
Unit 103
Kent, Washington 98031
United States
Tel: (206) 575-6246
Fax: (855) 897-3881
ahong@advancedpolymer.us

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Amended Response to Default Judgement has been served on Conopco, Inc. by mailing said copy on June 24nd, 2016, via First Class Mail, postage prepaid to:

Lisa Rosaya
Joshua S. Wolkoff
Baker & McKenzie LLP
452 Fifth Avenue
New York, New York 10018

ANDRY HONG

Date